

# UNITED STATES DISTRICT COURT

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

FEB 09 2012

DISTRICT OF WYOMING

Stephan Harris, Clerk  
Cheyenne

**UNITED STATES OF AMERICA**

V.

**CRIMINAL COMPLAINT**

**BOBBY JACK JENKINS,**

CASE NUMBER: 12 MJ 29 F

I, Calvin Boggs, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about February 7, 2012, the Defendant, **BOBBY JACK JENKINS**, knowingly and wilfully did transmit in interstate commerce from a state outside to the State of Wyoming, to the State of Wyoming, a communication, to wit a telephone call to the Deputy Administrator of the Wyoming Disability Determination Services, and the communication contained a threat to injure and kill the person of another.

In violation of 18 U.S.C. §875(c).

I further state that I am a Special Agent with the Department of Homeland Security, and that this complaint is based on the following facts:

1. Your Complainant is employed as a Special Agent (SA) with the Federal Protective Service (FPS) and have been so employed since 2002. Your Complainant is currently assigned to the FPS Investigations Section in Fort Collins, Colorado.

Continued on the attached sheet and made a part hereof:    ☒ Yes        ☐ No



Signature of Complainant  
**KALVIN BOGGS**

Sworn to before me and subscribed in my presence,

February 9, 2012

at

CHEYENNE, WYOMING

Date

City and State

**HON. NANCY D. FREUDENTHAL**  
**United States District Court Judge**

Name & Title of Judicial Officer

  
Signature of Judicial Officer

**CONTINUED SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT  
U.S. v. BOBBY JACK JENKINS**

2. Your Complainant is a graduate of Fort Lewis College, Durango Colorado with a Bachelors of Psychology. Your Complainant is also a graduate of the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. As an SA with FPS, your Complainant has received training in investigating violations of federal statutes. Prior to being employed as an FPS SA, your Complainant was the Detective Lieutenant with the Montezuma County Sheriff's Office in Cortez Colorado, responsible for investigating and supervising the investigations of felony criminal investigations.

3. Based upon your Complainant's training, experience and participation in other investigations, your Complainant knows:

4. On January 9, 2012, at approximately 10:00 AM, FPS officers were notified of a threatening voice mail message left on the phone of a Social Security Administration (SSA) employee. The caller leaving the threatening voice mail message identified himself as Bobby JENKINS, having a date of birth of XXXXX, 1959, and a Social Security Number of XXX-XX-8691. The name, date of birth and social security number left by the caller did correspond with one Bobby Jack Jenkins, who had applied to the Social Security Administration for disability benefits. In the voice mail message JENKINS cursed and stated; "you people, better get their act together and do something or someone is going to come to your office and start shooting people!" Jenkins left a second voice mail message shortly after expressing his anger and frustration over his benefit claim being denied.

5. Based upon the threats JENKINS made, the SSA issued a ban notice to JENKINS, prohibiting him from conducting business in person at any SSA office. JENKINS must now conduct his business with SSA via telephone, internet or mail.

6. On February 6, 2012, JENKINS contacted the Cheyenne Wyoming Disability Determination Services (DDS) and left a voice mail requesting someone contact him. JENKINS provided telephone number 307-413-8664 as a contact number. DDS Deputy Administrator Jeff Graham returned JENKINS' telephone call at approximately 3:25 PM on February 6, 2012. During this phone call, JENKINS discussed with Graham his disability claim. JENKINS asked about the status of his social security disability claim. Graham referred JENKINS to the Cheyenne Wyoming SSA field office, at which point JENKINS became verbally abusive, using profanity and making threats against federal offices and federal employees. JENKINS stated "I will take my fucking rifle and start shooting fucking federal employees and federal offices!" JENKINS stated "the federal employees would be looking at the front of the fucking barrel of his rifle." At this point Graham informed JENKINS that he was making very serious threats that would be taken seriously. JENKINS stated that he did not care, and terminated the call.

7. On February 7, 2012, JENKINS left two voice mail messages on the Wyoming DDS voice mail system. One message was left at approximately 9:15 AM and one at approximately 9:30 AM. JENKINS identifies himself by his date of birth, and his Social Security number. In both voice mail messages left by JENKINS, he threatens to come to the state office of Wyoming and kill employees. JENKINS stated "Give me back all the money you owe me for the past twenty fucking years, or I'm gonna come down to the fucking state of Wyoming . . . I might be in the Saw Tooth

Wilderness, but I'm going to find a way to get to fucking Wyoming, and don't think I wont shoot your fucking office you dirty fucking state . . . I'll shoot your fucking office up so fucking fast, you don't even know what comes to you . . . You know, don't push me, don't fucking push me. I'll tell you right now, I rode my horses sixty fucking miles to shoot your fucking office once before, I'll do it a fucking gin . . . call the fucking FBI, call the intelligence from DC . . . you get one of your Highway Patrol or your dirty cops to pull me over, I'll put a fucking hole in their fucking heads, and I'm fucking dead ass fucking serious . . . I'll tell you what, if there is a war to start, I'll be the first one to fire, and I'll fire you pieces of fucking shit!"

8. Graham then contacted the State of Wyoming Capitol Protective Services and spoke with Lieutenant Guenther, and Trooper Jerkins. Graham informed them of the nature of the two voice mail messages. After consulting with his staff, a determination was made to close the DDS office for safety reasons.

9. Your Complainant knows that the Saw Tooth Mountains are located in Idaho, outside of the District of Wyoming. Additionally, JENKINS states in the various calls that he intends to come to Wyoming, or come down to Wyoming, inferring that the telephone calls he is making are being made from a location outside of the State of Wyoming, and that the telephone communications are therefore being transmitted in interstate commerce.

10. WHEREFORE, your Complainant respectfully request that the Court issue an arrest warrant for Bobby Jack JENKINS

**End of Sworn Statement**

**PENALTY SUMMARY**

**DATE:** February 9, 2012

**DEFENDANT NAME:** **BOBBY JACK JENKINS**

**VICTIM:** **YES**

**OFFENSE AND PENALTIES:**

**OFFENSE:** **18 U.S.C. §875(c)**  
**(Interstate Communication with Intent to Injure)**

**PENALTY:** 0-5 YEARS IMPRISONMENT  
\$250,000 FINE  
3 YEARS SUPERVISED RELEASE  
\$100 SPECIAL ASSESSMENT

**AGENT:** Calvin Boggs,  
Homeland Security

**AUSA:** Steven K. Sharpe

**ESTIMATED TIME OF TRIAL:**

☒ five days or less  
☐ over five days  
☐ other

**INTERPRETER NEEDED:**

☐ Yes  
☒ No

**THE GOVERNMENT:**

☒ will  
☐ will not

☐ The court should not grant bond  
because the defendant is not bondable  
because there are detainers from other  
jurisdictions

**SEEK DETENTION IN THIS CASE.**